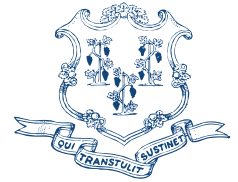




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The Energy and Technology Committee

March 3, 2022, Public Hearing

Testimony of Claire E. Coleman, Interim Consumer Counsel

Senate Bill No. 176

An Act Concerning Shared Clean Energy Facilities

Thank you for the opportunity to present testimony regarding **Senate Bill No. 176, An Act Concerning Shared Clean Energy Facilities**. The Office of Consumer Counsel (OCC) is the State's principal advocate for consumers of electric, gas, water, and telecommunications services.

OCC supports expanding access to renewable clean energy to areas and populations that have historically not had access or ability to participate in Connecticut's clean energy programs. OCC supports developing a program where shared clean energy facilities (SCEF) facilities are developed in environmental justice communities, where such communities can benefit from siting solar within their community. However, given the current program does not have a correlation between the siting location of the SCEF array and who gets to participate in the program, broader changes may need to be made to realize the intended goal of this proposed program change. OCC also supports the increase in the cap from 20MW per year to 35MW per year, especially if nameplate capacity for the generation sites will also increase from 2MW-5MW. OCC would hope that this would result in larger SCEF projects and that the state will benefit from economies of scale to deploy more solar with less ratepayer impact. To remain consistent with the priorities established by PURA, the OCC encourages most of this increase to go to low-income subscribers and environmental justice communities.

Regarding whether Electric Distribution Companies (EDCs) should be allowed to own SCEF facilities, the OCC advises that this is a complex issue involving complicated considerations of both competition and deregulation, and should be studied further to understand both market and ratepayer impacts. Ultimately, OCC supports SCEF facility ownership that leads to the lowest cost, sustainable deployment of solar to ratepayers.

Finally, given that increasing system size of commercial and industrial (C&I) solar projects to an entire roof provides economies of scale and reduces overall fixed costs of solar deployment, OCC supports the proposal in Section 4 to allow C&I customers participating in the non-residential renewable energy tariff program to use their entire roof space for generation. OCC cautions, however, that there are both costs and benefits to increasing distributed generation, and in its annual review of the non-residential solar program, PURA should be required to evaluate the impact on the local distribution and transmission system, and corresponding investment requirements, to ensure there is no unintended consequences and overall negative ratepayer impact to this change. This should be evaluated in the context of assessing overall optimization of distributed resources as we deploy other technologies in the grid modernization initiatives, such as energy storage and advanced metering infrastructure, which will better

enable elimination of peak usage and have positive benefits to the grid and utility consumers. OCC has suggested utilizing *The National Standard Practice Manual for Benefit-Cost Analysis of Distributed Energy Resources (NSPM for DERs)* to examine Connecticut's DER programs.

Overall OCC supports Senate Bill 176, and we look forward to working to refine the bill to address the concerns noted above. Should you have any questions, please do not hesitate to contact me at Claire.E.Coleman@ct.gov.